

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
VERTEX ENERGY, INC., <i>et al.</i> , <sup>1</sup>	)	
	)	Case No. 24-90507 (CML)
Reorganized Debtors.	)	(Jointly Administered)
	)	

**REORGANIZED DEBTORS' EMERGENCY MOTION FOR ENTRY OF A  
FINAL DECREE CLOSING CERTAIN OF THE CHAPTER 11 CASES**

**Emergency relief has been requested. Relief is requested not later than 4:00 p.m. (prevailing Central Time) on March 31, 2025.**

**If you object to the relief requested or you believe that emergency consideration is not warranted, you must appear at the hearing if one is set, or file a written response prior to the date that relief is requested in the preceding paragraph. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.**

The above-captioned reorganized debtors (collectively, the “Reorganized Debtors,” and before the Effective Date<sup>2</sup> of the Plan, the “Debtors”) state as follows in support of this emergency motion (the “Motion”):

**Relief Requested**

1. The Reorganized Debtors seek entry of a final decree, substantially in the attached form (the “Final Decree”), (a) closing each of the Debtors’ Chapter 11 Cases other than the case of Bango Oil LLC, Case No. 24-90508 (the “Remaining Case”), and (b) granting related relief.

<sup>1</sup> A complete list of each of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/vertex>. The location of Reorganized Debtor Vertex Energy, Inc.’s corporate headquarters and the Reorganized Debtors’ service address in these Chapter 11 Cases is 1331 Gemini Street, Suite 250, Houston, Texas 77058.

<sup>2</sup> Capitalized terms used but not otherwise defined in this Motion shall have the meanings ascribed to them in the *Second Amended Joint Chapter 11 Plan of Vertex Energy, Inc. and its Debtor Affiliates* [Docket No. 564] (the “Plan”).



### **Jurisdiction and Venue**

2. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the *Amended Order of Reference to Bankruptcy Judges*, dated May 24, 2012, from the United States District Court for the Southern District of Texas. This is a core proceeding pursuant to 28 U.S.C. § 157(b). The Reorganized Debtors confirm their consent to the Court’s entry of a final order in connection with this Motion.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The bases for the relief requested herein are sections 105(a) and 350(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), rule 3022 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rules 1075-1 and 9013-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”).

### **Background**

5. On September 24, 2024 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.<sup>3</sup> On September 25, 2024, this Court entered an order [Docket No. 15] authorizing the joint administration of these Chapter 11 Cases pursuant to Bankruptcy Rule 1015(b) under the case of Vertex Energy, Inc., Case No. 24-90507 (the “Lead Case”). The Chapter 11 Cases other than the Lead Case are as follows:

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<sup>3</sup> A detailed description of the facts and circumstances of these Chapter 11 Cases is set forth in the *Declaration of R. Seth Bullock, Chief Restructuring Officer of Vertex Energy, Inc., In Support of the Debtors’ Chapter 11 Petitions and First Day Motions* [Docket No. 18].

Debtor	Case Number
Bango Oil LLC	24-90508
Cedar Marine Terminals, LP	24-90509
Crossroad Carriers, L.P.	24-90510
Crystal Energy, LLC	24-90511
H&H Oil, L.P.	24-90512
HPRM LLC	24-90513
Tensile-Heartland Acquisition Corporation	24-90514
Tensile-Myrtle Grove Acquisition Corporation	24-90515
Vertex Acquisition Sub, LLC	24-90516
Vertex Energy Operating, LLC	24-90506
Vertex Energy, Inc.	24-90507
Vertex II GP, LLC	24-90521
Vertex Marine Fuel Services LLC	24-90518
Vertex Merger Sub, LLC	24-90519
Vertex Recovery Management, LLC	24-90520
Vertex Recovery, L.P.	24-90517
Vertex Refining Alabama LLC	24-90522
Vertex Refining LA, LLC	24-90523
Vertex Refining Myrtle Grove LLC	24-90524
Vertex Refining NV, LLC	24-90525
Vertex Refining Texas LLC	24-90526
Vertex Renewables Alabama LLC	24-90527
Vertex Renewables LLC	24-90528
Vertex Splitter Corporation	24-90529

6. On December 20, 2024, the Court confirmed the Plan and entered the *Order Confirming the Second Amended Joint Chapter 11 Plan of Vertex Energy, Inc. and its Debtor Affiliates* [Docket No. 578] (the “Confirmation Order”). The Confirmation Order is final, non-appealable, and not subject to any pending appeal.<sup>4</sup>

7. On January 21, 2025, the Debtors substantially consummated the Plan, and the Effective Date occurred.<sup>5</sup>

<sup>4</sup> See the Confirmation Order, ¶ 165 (“This Confirmation Order is a Final Order and the period in which an appeal must be Filed shall commence upon the entry hereof.”). Pursuant to Bankruptcy Rule 8002, an appeal must have been filed within fourteen (14) days of entry of the Confirmation Order. No such appeal was filed.

<sup>5</sup> See Notice of (I) Entry of an Order Confirming the Second Amended Joint Chapter 11 Plan of Vertex Energy, Inc. and its Debtor Affiliates and (II) Occurrence of the Effective Date [Docket No. 646].

8. The Plan and Confirmation Order established the GUC Trust on the Effective Date pursuant to the terms of the GUC Trust Agreement. On the Effective Date, the GUC Trustee was appointed to administer the GUC Trust. Also on the Effective Date, the GUC Trust Assets, including the GUC Causes of Action, were transferred to the GUC Trust.

9. The Claims Bar Date expired on November 27, 2024 and on March 24, 2025, the Governmental Bar Date (as defined in the *Order (I) Establishing Deadlines for the Filing of Proofs of Claim, (II) Approving the Form and Manner of Notice Thereof, (III) Approving the Form and Manner for Filing Proofs of Claim, and (IV) Granting Related Relief* [Docket No. 312] (the “Bar Date Order”)) expired. To date, 637 Proofs of Claim have been filed in these Chapter 11 Cases. The Reorganized Debtors and the GUC Trustee (solely with respect to General Unsecured Claims and 2027 Convertible Notes Claims), as applicable, are continuing to review the Proofs of Claim and may object to certain Proofs of Claim in the future (the “Claims Reconciliation Process”).<sup>6</sup> Similarly, the Reorganized Debtors are continuing to reconcile and settle any Cure disputes pertaining to the assumption of certain Executory Contracts or Unexpired Leases (“Cure Reconciliation Process”).<sup>7</sup>

10. The Plan provides that the Reorganized Debtors and the GUC Trustee (solely with respect to General Unsecured Claims and 2027 Convertible Notes Claims) have the exclusive authority to (a) File, withdraw, or litigate to judgment any objections to Claims, (b) settle or compromise any such objections to Claims without further notice to or action, order, or approval of the Bankruptcy Court, and (c) administer and adjust the Claims Register to reflect such

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<sup>6</sup> See Article VII.C of the Plan.

<sup>7</sup> See Article VII.C of the Plan.

settlements or compromises without further notice to or action, order, or approval of the Bankruptcy Court.<sup>8</sup>

11. Additionally, pursuant to the Plan, all requests for payment of Professional Claims for services rendered and reimbursement of expenses incurred prior to the Effective Date were required to be filed no later than forty-five (45) days after the Effective Date (the “Fee Applications”). As of the date hereof, the objection deadline to all Fee Applications has passed and no objections to the Fee Applications have been received.

12. Pursuant to sections 3.1.6 and 3.2 of the Trust Agreement, the GUC Trust has the exclusive authority to commence, pursue, prosecute, enforce, abandon, waive, settle, compromise, release, or withdraw, as appropriate, any and all GUC Causes of Action (the “GUC Causes of Action Process”).

13. Although the Reorganized Debtors do not anticipate any further significant contested matters related to their Chapter 11 Cases, miscellaneous motions, applications, pleadings, or other matters or proceedings may arise from time to time (together with the Claims Reconciliation Process, the Cure Reconciliation Process, the Fee Applications, and the GUC Causes of Action Process the “Remaining Matters”). Any Remaining Matters related to any of the Reorganized Debtors can be filed, administered, and adjudicated in the Remaining Case without any substantive or negative impact on any party in interest.<sup>9</sup>

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<sup>8</sup> See Article VII.B of the Plan.

<sup>9</sup> The Reorganized Debtors reserve all rights to dispute any outstanding Claims, and the failure of the Reorganized Debtors to object to any Claim filed in these Chapter 11 Cases prior to entry of the Final Decree shall not cause such Claim to be deemed Allowed. The Reorganized Debtors request that the Court permit any objections to Claims against or Interests in any of the Chapter 11 Cases to be filed, administered, and adjudicated in the Remaining Case.

14. The Reorganized Debtors believe that closing these Chapter 11 Cases other than the Remaining Case is in the best interest of the Reorganized Debtors as it will greatly reduce the fees attributable to remaining in chapter 11.

**Basis for Relief**

15. Section 350(a) of the Bankruptcy Code provides that “[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case.” 11 U.S.C. § 350(a). Bankruptcy Rule 3022, which implements section 350 of the Bankruptcy Code, further provides that “[a]fter an estate is fully administered in a chapter 11 reorganization case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case.” Fed. R. Bankr. P. 3022.

16. The term “fully administered” is not defined in the Bankruptcy Code, the Bankruptcy Rules, or the Bankruptcy Local Rules. The Advisory Committee Note to Bankruptcy Rule 3022 (the “Advisory Committee Note”), however, sets forth the following non-exclusive factors to be considered in determining whether a case has been fully administered:

- i. whether the order confirming the plan has become final;
- ii. whether deposits required by the plan have been distributed;
- iii. whether the property proposed by the plan to be transferred has been transferred;
- iv. whether the debtor or the successor of the debtor under the plan has assumed the business or the management of the property dealt with by the plan;
- v. whether payments under the plan have commenced; and
- vi. whether all motions, contested matters, and adversary proceedings have been finally resolved.

Fed. R. Bankr. P. 3022, Advisory Comm. Note (1991). Courts look “to the advisory committee’s notes on Bankruptcy Rule 3022 in seeking guidance as to the meaning of ‘fully administered.’”

*In re JCP Props., Ltd.*, 540 B.R. 596, 605 (Bankr. S.D. Tex. 2015).

17. In addition to the factors set forth in the Advisory Committee Note, courts have considered whether the plan of reorganization has been substantially consummated. *See, e.g., In re JCP Props., Ltd.*, 540 B.R. at 605 (commenting that “substantial consummation is the pivotal question here to determine the propriety of closing the [case]”). Section 1101(2) of the Bankruptcy Code defines substantial consummation as the: (A) transfer of all or substantially all of the property proposed by the plan to be transferred; (B) assumption by the debtor or by the successor to the debtor under the plan of the business or of the management of all or substantially all of the property dealt with by the plan; and (C) commencement of distribution under the plan.

18. Bankruptcy courts have adopted the view that “[the Advisory Committee Note] factors are but a guide in determining whether a case has been fully administered, and not all factors need to be present before the case is closed.” *In re SLI, Inc.*, Case No. 02-12608 (WS), 2005 WL 1668396, at \*2 (Bankr. D. Del. June 24, 2005).

19. Courts have also noted that entry of a final decree is appropriate to stop the accrual of fees paid to the U.S. Trustee pursuant to section 1930 of the United States Code (the “Section 1930 Fees”). *See In re Jay Bee Enters., Inc.*, 207 B.R. 536, 539 (Bankr. E.D. Ky. 1997) (concluding that “it seems appropriate to close this case to stop the financial drain on the debtor” due to accrual of Section 1930 Fees).

20. Here, the foregoing factors weigh strongly in favor of closing all of the Chapter 11 Cases except for the Remaining Case (collectively, the “Affiliate Cases”). The Confirmation Order is a final order, the Effective Date of the Plan has occurred, and the Plan is substantially consummated.<sup>10</sup> The Debtors’ estate property has transferred to the Reorganized Debtors or the

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<sup>10</sup> Article IX.D of the Plan provides that “‘Substantial Consummation’... as defined in 11 U.S.C. § 1101(2), shall be deemed to occur on the Effective Date.”

GUC Trust, as applicable, in accordance with the Plan, and the Reorganized Debtors have assumed the management and control over the Debtors' businesses. Thus, the Affiliate Cases have been "fully administered." Closing the Affiliated Cases is consistent with the confirmed Plan, which provides that "[u]pon the occurrence of the Effective Date, the Reorganized Debtors shall be permitted to close all of the Chapter 11 Cases except for one of the Chapter 11 Cases"<sup>11</sup> and that "all of the Chapter 11 Cases shall be closed as soon as reasonably practicable."<sup>12</sup>

21. While the Reorganized Debtors acknowledge that the payment of certain Claims may be pending, such Claims will be paid pursuant to the Plan in the Remaining Case or outside the Chapter 11 Cases in accordance with the Bankruptcy Code and the Plan. Bankruptcy courts in the Fifth Circuit have entered final decrees and closed cases despite certain claims being unpaid. *See, e.g., In re Anachoreta, Inc.*, No. 18-36960 (MI) (Bankr. S.D. Tex. Jun. 26, 2020); *In re EXCO Services, Inc.*, No. 18-30167 (MI) (Bankr. S.D. Tex. Nov. 12, 2019). "The court should not keep [a] case open only because of the possibility that the court's jurisdiction may be invoked in the future." Fed. R. Bankr. P. 3022, Advisory Comm. Note (1991). Moreover, the entry of the Final Decree closing the Affiliate Cases would be without prejudice to creditors' rights to petition the Court to reopen any of such cases pursuant to section 350(b) of the Bankruptcy Code.

22. The Reorganized Debtors and the GUC Trustee, as applicable, will work to resolve the Remaining Matters. To the extent issues arise relating to the Reorganized Debtors, such matters can be resolved under the Remaining Case without keeping the dockets of the Affiliate Cases open. Closing the dockets of the Affiliate Cases will have no impact on the resolution of any remaining Claims or distributions, other legal entitlements under the Plan, or the substantive

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<sup>11</sup> See Article IV.V of the Plan.

<sup>12</sup> See Article IV.I.12 of the Plan.



rights of any party in interest, and would stop the accrual of Section 1930 Fees associated with the Affiliate Cases. Accordingly, entry of the Final Decree closing the Affiliate Cases is in the best interests of the Reorganized Debtors and an appropriate use of the Court's equitable powers pursuant to section 105(a) of the Bankruptcy Code.

**Emergency Consideration**

23. Pursuant to Local Rule 9013-1(i), the Reorganized Debtors respectfully request emergency consideration of this Motion. Prompt entry of the Final Decree will allow the Reorganized Debtors to save administrative costs that would accrue if the Affiliate Cases were to remain open.

**Notice**

24. The Debtors will provide notice of this Motion to the following parties or their respective counsel: (a) the U.S. Trustee; (b) the holders of the thirty (30) largest unsecured claims against the Debtors (on a consolidated basis); (c) counsel to the Consenting Term Loan Lenders; (d) the agent under the Debtors' Term Loan Facility, and counsel thereto; (e) the agent under the Debtors' DIP Facility and counsel thereto; (f) counsel to the GUC Trustee; (g) counsel to Macquarie; (h) the United States Attorney's Office for the Southern District of Texas; (i) the Internal Revenue Service; (j) the United States Securities and Exchange Commission; (k) the state attorneys general for states in which the Debtors conduct business; and (l) any party that has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, no other or further notice need be given.

The Reorganized Debtors request that the Court enter the Final Decree granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Houston, Texas  
March 27, 2025

/s/ Jason G. Cohen

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**Certificate of Accuracy**

I certify that the foregoing statements are true and accurate to the best of my knowledge.  
This statement is being made pursuant to Bankruptcy Local Rule 9013-1(i).

/s/Jason G. Cohen

Jason G. Cohen

**Certificate of Service**

I certify that, on March 27, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/Jason G. Cohen

Jason G. Cohen

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In re:

VERTEX ENERGY, INC., *et al.*,<sup>1</sup>

Reorganized Debtors.

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)  
) Chapter 11  
)  
) Case No. 24-90507 (CML)  
)  
) (Jointly Administered)  
)  
) **Re: Docket No. \_\_**

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**FINAL DECREE CLOSING CERTAIN OF THE CHAPTER 11 CASES**

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Upon the emergency motion (the “Motion”)<sup>2</sup> of the above-captioned reorganized debtors (collectively, the “Reorganized Debtors,” and before the Effective Date of the Plan, the “Debtors”) for entry of a final decree (this “Final Decree”) pursuant to section 350(a) of the Bankruptcy Code and Bankruptcy Rule 3022, closing the Affiliate Cases, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is permissible pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Reorganized Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Reorganized Debtors’ notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need

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<sup>1</sup> A complete list of each of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/vertex>. The location of Reorganized Debtor Vertex Energy, Inc.’s corporate headquarters and the Reorganized Debtors’ service address in these Chapter 11 Cases is 1331 Gemini Street, Suite 250, Houston, Texas 77058.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

be provided; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The following Affiliate Cases are hereby closed; *provided* that this Court shall retain jurisdiction as provided in the Plan, the Confirmation Order, and this Final Decree:

<b>Debtor</b>	<b>Case Number</b>
Cedar Marine Terminals, LP	24-90509
Crossroad Carriers, L.P.	24-90510
Crystal Energy, LLC	24-90511
H&H Oil, L.P.	24-90512
HPRM LLC	24-90513
Tensile-Heartland Acquisition Corporation	24-90514
Tensile-Myrtle Grove Acquisition Corporation	24-90515
Vertex Acquisition Sub, LLC	24-90516
Vertex Energy Operating, LLC	24-90506
Vertex Energy, Inc.	24-90507
Vertex II GP, LLC	24-90521
Vertex Marine Fuel Services LLC	24-90518
Vertex Merger Sub, LLC	24-90519
Vertex Recovery Management, LLC	24-90520
Vertex Recovery L.P.	24-90517
Vertex Refining Alabama LLC	24-90522
Vertex Refining LA, LLC	24-90523
Vertex Refining Myrtle Grove LLC	24-90524
Vertex Refining NV, LLC	24-90525
Vertex Refining Texas LLC	24-90526
Vertex Renewables Alabama LLC	24-90527
Vertex Renewables LLC	24-90528
Vertex Splitter Corporation	24-90529

2. The Remaining Case of Bango Oil LLC, Case No. 24-90508, shall remain open pending the entry of a final decree by this Court closing the Remaining Case.

3. The clerk shall designate on the dockets of the Affiliate Cases that the cases are now being administered under the Remaining Case and shall make a docket entry in each of the Affiliate Cases substantially similar to the following:

An order has been entered in this case directing that all further reporting concerning the administration of the assets and liabilities in this case will occur only in the case of Bango Oil LLC, Case No. 24-90508. The docket in Case No. 24-90508 should be consulted for all matters affecting this case.

4. The following caption shall be used in the Remaining Case going forward:

In re:	)	
	)	Chapter 11
Bango Oil LLC	)	Case 24-90508 (CML)
	)	
Reorganized Debtor.	)	(Formerly Jointly Administered
	)	Under Lead Case Vertex Energy, Inc.,
	)	Case No. 24-90507)

5. Subject to the terms of the Plan and the Confirmation Order, the Court retains jurisdiction and authority with regard to the Remaining Matters, whether or not they pertain to the Remaining Case or the Affiliate Cases and whether or not they are pending before the Court in the Remaining Case or the Affiliate Cases. Any actions with regard to the Remaining Matters (including with respect to the Claims Reconciliation Process, Cure Reconciliation Process, Fee Applications, and the GUC Causes of Action Process, whether currently pending in an Affiliate Case or not) shall be filed, administered, and/or adjudicated in the Remaining Case without the need to reopen any Affiliate Case. Any failure of the Reorganized Debtors, or any entity, including the GUC Trust, authorized pursuant to the Plan, as applicable, to file an objection to any Claim against or Interest in any Reorganized Debtor on or prior to entry of this Final Decree shall not constitute allowance of the Claim or Interest and shall not result in such Claim or Interest being deemed allowed against or in any Reorganized Debtor. Any objections to Claims against or

Interests in the Reorganized Debtors may be filed, administered, and adjudicated in the Remaining Case. Any surviving Causes of Action, including the GUC Causes of Action, may be commenced and adjudicated in the Remaining Case.

6. Notwithstanding the relief granted in this Final Decree and any actions taken pursuant to such relief, nothing in this Final Decree shall be deemed: (a) an admission as to the amount of, basis for, or validity of any Claim under the Bankruptcy Code or applicable non-bankruptcy law; (b) a waiver of the rights of the Reorganized Debtors to dispute any Claim on any grounds; (c) a promise or requirement to pay any Claim; (d) a waiver of any Claims or Causes of Action, including GUC Causes of Action, which may exist against any entity; or (e) a waiver or limitation of the rights of the Debtors, the Reorganized Debtors, the GUC Trust, or any other parties in interest under the Bankruptcy Code or any other applicable law.

7. After the date of entry of this Final Decree, no Reorganized Debtor in an Affiliated Case shall be obligated to file quarterly operating reports; *provided, however* that, within forty-five (45) days after entry of this Final Decree, the Reorganized Debtors of the Affiliate Cases shall file post-confirmation reports for the period from January 1, 2025 to the date this Final Decree is entered.

8. The Reorganized Debtors shall pay the appropriate sum of quarterly fees due and payable under 28 U.S.C. § 1930(a)(6)(A) and (B) for the Affiliate Cases by the later of (i) twenty-one (21) days after the date of entry of the Final Decree and (ii) the date on which such quarterly fees are otherwise due. This Court shall retain jurisdiction to enforce fees assessed under 28 U.S.C. § 1930(a)(6)(A) and (B).

9. Quarterly disbursements for the Remaining Case will be reported in post-confirmation reports and quarterly fees will be paid when due and payable under

28 U.S.C. § 1930(a)(6)(A) and (B) pending the entry of a final decree by this Court closing the Remaining Case.

10. Entry of this Final Decree is without prejudice to (a) the rights of the Reorganized Debtors, the GUC Trustee, or any party in interest to seek to reopen any of the Affiliate Cases for cause pursuant to section 350(b) of the Bankruptcy Code, and (b) the rights of the Reorganized Debtors, the GUC Trustee, or any entity authorized pursuant to the Plan, as applicable, to dispute any Claims that were or will be filed against the Reorganized Debtors in these Chapter 11 Cases, or commence any adversary proceeding or contested matter related to any Cause of Action, including the GUC Causes of Action, as provided in the Plan and the Confirmation Order.

11. Notice of the Motion as provided therein shall be deemed good and sufficient and satisfies the requirements of Bankruptcy Rule 6004(a) and the Bankruptcy Local Rules.

12. This Final Decree shall be effective and enforceable upon its entry.

13. The Reorganized Debtors, the GUC Trustee, and any entity authorized pursuant to the Plan, and their respective agents, are authorized to take all actions necessary to effectuate the relief granted pursuant to this Final Decree in accordance with the Motion.

14. Nothing in this Final Decree shall change the amount or nature of any distribution, or any other substantive rights, that any Claim against or Interest in any Debtor would have been entitled to under the Plan, the Confirmation Order, the Bankruptcy Code, the Bankruptcy Rules, or otherwise, had this Final Decree not been entered.



15. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Final Decree.

Signed: \_\_\_\_\_, 2025

\_\_\_\_\_  
Christopher M. Lopez  
United States Bankruptcy Judge